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April 30, 2007

## VIA CM/ECF AND HAND DELIVERY

The Honorable Joseph J. Farnan, Jr. United States District Court District of Delaware 844 King Street Wilmington, DE 19801

Re: Magten Asset Management Corp. and Law Debenture Trust Co. v. NorthWestern Corp.; C.A. No. 04-1494-JJF; and Magten Asset Management Corp. v. Mike J. Hanson and Ernie J. Kindt; C.A. No. 05-

0499-JJF

Your Honor:

Today, Defendant NorthWestern Corporation requested oral argument (D.I. 169 in Case 04-1494; D.I. 203 in Case 05-499) on its Emergency Cross-Motion filed on April 16, 2007. By this letter, Magten Asset Management Corporation hereby agrees that oral argument may be helpful to the Court, and similarly requests it pursuant to Delaware Local Rule 7.1.4.

However, because the issues raised by NorthWestern's Emergency Cross-Motion are interrelated with issues raised by Magten's Emergency Motion that was earlier-filed on April 13, 2007 (D.I. 139 in Case 04-1494; D.I. 175 in Case 05-499), Magten respectfully requests that any proposed hearing address the issues raised by Magten's Emergency Motion, as well as by NorthWestern's Emergency Cross-Motion.

Magten does intend to file a reply brief to address significant developments that bear upon this action since its opening brief was filed. Magten's reply brief will be submitted on or before the May 4, 2007 deadline, at which time briefing on both the Emergency Motion and the Emergency Cross-Motion will be complete.

Counsel is available by telephone, should the Court have any questions.

Respectfully submitted,

Dale R. Dubé LD. No. 2863

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The Honorable Joseph J. Farnan, Jr. April 30, 2007 Page 2

## DRD/pb

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